

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARMEN AMBERT,

Plaintiff,

-against-

NEW YORK CITY HOUSING AUTHORITY,
TINO HERNANDEZ, In His Individual
Capacity And As Chairman Of the New York
City Housing Authority, and DOUGLAS
APPLE, In His Individual Capacity And As
General Manager Of the New York City
Housing Authority,

Defendants.

Civ. No. 08-3073 (RJH)

**AFFIDAVIT OF DONNA
M. MURPHY, ESQ.
PURSUANT TO LOCAL
RULE 1.4 IN SUPPORT OF
DEFENDANTS' REQUEST
TO SUBSTITUTE
COUNSEL**

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

DONNA M. MURPHY, being duly sworn, deposes and says:

1. I am Of Counsel to Ricardo Elias Morales, General Counsel of the New York City Housing Authority. I am familiar with the facts set forth herein.

2. This Affidavit is submitted pursuant to Rule 1.4 of the Local Rules of the United States District Court for the Southern District of New York in connection with the request of Defendants New York City Housing Authority, Tino Hernandez, and Douglas Apple (collectively "Defendants") (1) to permit Ricardo Elias Morales, General Counsel, New York City Housing Authority and me as Of Counsel to Ricardo Elias Morales, General Counsel of the New York City Housing Authority, to withdraw as counsel of record for Defendants named in this litigation, and (2) to permit Jackson Lewis LLP, by John A. Snyder, Esq., Matthew A. Steinberg, Esq. and Jason A. Zoldessy, Esq. to be submitted as counsel of record for Defendants

in connection with the above-captioned action.

3. At the outset of this matter, Defendants retained Mr. Morales and me to represent them in this action. In June 2008, Defendants determined they wished to have Jackson Lewis LLP substitute in as their counsel of record.

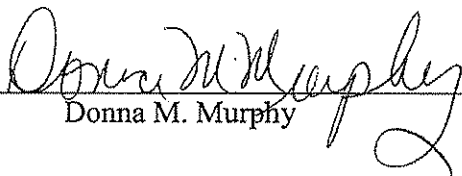
4. I will cooperate in effectuating this substitution.

5. On or about March 26, 2008, Plaintiff filed a Complaint against Defendants alleging claims under 42 U.S.C. section 1983 for alleged violations of her rights under the First Amendment and the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, and discrimination and retaliation claims under the New York City Administrative Code and the New York State Human Rights Law.

6. Defendants filed an Answer to the Complaint on or about June 10, 2008.

7. An initial case conference has been scheduled in this matter for July 18, 2008.

8. Based on the foregoing, Defendants respectfully request that the Court permit Mr. Morales and me to withdraw as counsel of record for Defendants and to permit Jackson Lewis LLP, by John A. Snyder, Esq., Matthew A. Steinberg, Esq. and Jason A. Zoldessy, Esq. to substitute as counsel for Defendants in connection with the above-captioned action.



Donna M. Murphy

Sworn to before me this 10th day
of July 2008.



Notary Public

Corina L. Leske
Notary Public - State of New York
No. 02LE6135355
Qualified in Kings County
Commission Expires October 17, 2009